

**UNITED STATES DISTRICT COURT WESTERN DISTRICT OF PENNSYLVANIA**

ALANA SOUZA a/k/a ALANA CAMPOS,  
CIELO JEAN GIBSON a/k/a CJ GIBSON,  
DESSIE MITCHESON, EMILY SEARS, EVA  
PEPAJ, HEATHER RAE YOUNG, HILLARY  
FISHER VINSON a/k/a HILLARY HEPNER,  
JESSICA GOLDEN a/k/a JESSE GOLDEN,  
LUCY PINDER, MARIANA DAVALOS,  
MARKETA KAZDOVA, PAOLA CANAS,  
TIFFANY SELBY, RHIAN SUGDEN, and  
TIFFANY TOTH GRAY,

Plaintiffs,

- against -

BRASS SADDLE, INC. d/b/a THE FILLY  
CORRAL and BETTY ANN BISACCA,

Defendants.

Case No. 2:19-cv-00683

**MOTION FOR EXTENSION OF TIME  
TO COMPLETE SERVICE**

ELECTRONICALLY FILED

Plaintiffs ALANA SOUZA A/K/A ALANA CAMPOS, CIELO JEAN GIBSON a/k/a CJ GIBSON, DESSIE MITCHESON, EMILY SEARS, EVA PEPAJ, HEATHER RAE YOUNG, HILLARY FISHER VINSON A/K/A HILLARY HEPNER, JESSICA GOLDEN A/K/A JESSE GOLDEN, LUCY PINDER, MARIANA DAVALOS, MARKETA KAZDOVA, PAOLA CANAS, TIFFANY SELBY, RHIAN SUGDEN, and TIFFANY TOTH GRAY (collectively, “Plaintiffs”), by and through their undersigned counsel, as and for their Complaint (“Complaint”) against defendants BRASS SADDLE, INC. d/b/a THE FILLY CORRAL and BETTY ANN BISACCA (collectively “Defendants”) respectfully allege as follows:

1. Shortly after filing the instant lawsuit complaints and waiver of service packets were mailed to the primary place of business of the Defendants. The business location where the packets were sent is known to be in operation.

2. Those service packets were delivered and have not been returned to counsel.

3. The Defendants have not responded despite receiving copies of service documents and complaints.

4. After discussing with the front office clerk Plaintiff now seeks an additional 60 days to effectuate service of summons by way of personal service of sealed summons.

WHEREFORE, Plaintiff respectfully requests an additional 60 days to complete service on the Defendants.

Respectfully submitted,

s/Louis J. Kroeck  
Attorney for Plaintiff

Louis J. Kroeck  
PA ID No. 210045  
[Lou@Ljk-law.com](mailto:Lou@Ljk-law.com)

12<sup>th</sup> Floor, Park Building  
355 Fifth Avenue  
Pittsburgh, PA 15222  
412-712-7605

and

/s John Golaszewski  
John V. Golaszewski  
The Casas Law Firm, PC  
1740 Broadway, 15<sup>th</sup> Floor  
New York, New York  
T: 646-872-3178  
F: 855.220.9626  
[john@casaslawfirm.com](mailto:john@casaslawfirm.com)  
*\*Pro Hac Vice Application Forthcoming*